

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:
JOANN INC., et al., Debtors.

Chapter 11
Case No. 25-10068 (CTG)
(Jointly Administered)

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US BANKRUPTCY COURT
DISTRICT OF DELAWARE

RESPONSE OF ROHLIG USA, LLC TO DEBTORS' SIXTH OMNIBUS OBJECTION TO CERTAIN CLAIMS (SUBSTANTIVE)

Rohlig USA, LLC (the "Claimant"), by and through its authorized representative, hereby submits this Response to the Debtors' Sixth Omnibus Objection to Certain Claims (Substantive) (the "Objection"), and respectfully states as follows:

Claimant timely filed two proofs of claim against Debtor Jo-Ann Stores, LLC:

A claim asserting priority status under 11 U.S.C. §503(b)(9) in the amount of \$39,959.88.

A separate unsecured claim in the amount of \$30,114.88.

Upon further review, Claimant acknowledges that the filing of the 503(b)(9) portion was in error, as the goods or services provided did not qualify for administrative priority under 11 U.S.C. §503(b)(9). Both claims, however, represent valid obligations owed by the Debtors and should be allowed as general unsecured claims.

The Debtors, in their Objection, propose to allow only the unsecured portion of \$30,114.88 and disallow the \$39,959.88 asserted under 503(b)(9). This reduction is improper because it fails to recognize that both amounts reflect valid obligations owed to Claimant.

The total combined amount owed to Rohlig USA, LLC is \$70,074.76, which should be fully allowed as a general unsecured claim.

Supporting documentation for both components of the claim was submitted with the original proofs of claim, and Claimant stands ready to provide additional documentation upon request.

WHEREFORE, Claimant respectfully requests that the Court:

- (a) Overrule the Debtors' Objection as it pertains to Claimant;
- (b) Allow Rohlig USA, LLC's claim in the total amount of \$70,074.76 as a general unsecured claim; and
- (c) Grant such other and further relief as the Court deems just and proper.

Dated: June 12, 2025

Respectfully submitted,

Rohlig USA, LLC
1743 S. Linneman Road
Mount Prospect, IL 60056

By: Jerry Minnich
Authorized Representative

